

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TRAXCELL TECHNOLOGIES, LLC,

Plaintiff,

v.

**NOKIA SOLUTIONS AND NETWORKS
US LLC; NOKIA SOLUTIONS AND
NETWORKS OY; NOKIA
CORPORATION; NOKIA
TECHNOLOGIES OY; ALCATEL-
LUCENT USA, INC.; HMD GLOBAL OY;
AND T-MOBILE, USA, INC.,**

Defendants.

CASE NO. 2:18-CV-00412-RWS-RSP

DECLARATION OF MARTINA POKORNA

I, Martina Pokorna, declare and personally state the following:

1. I am an Executive Assistant in the London, United Kingdom office of HMD Global Oy, one of the defendants in this action. I provide this declaration in support of HMD Global Oy's Motion to Dismiss for Improper Service of Process. I have personal knowledge of the following, and, if called upon to do so, could and would testify competently thereto.

2. On January 23, 2019, I received a package at HMD Global Oy's London office via United States Postal Service Priority Mail Express. The package was addressed to "HMD Global." The package contained a document titled "Summons in a Civil Action" also addressed to "HMD Global." The package further contained a document titled "Plaintiff's Original Complaint for Patent Infringement." Finally, the package contained documents labeled Exhibits A, B and C, which appeared to be United States patents. No other documents were included in the package. Attached hereto as **Pokorna Exhibit 1** is a true and correct copy of the documents

contained in the January 23, 2019 package, except for Exhibits A, B and C (the United States patents, which have been omitted from Pokorna Exhibit 1 to save space).

3. On February 4, 2019, a package arrived at HMD Global Oy's London office via hand delivery, not by a bailiff or other government official. Neither I, nor anyone else to the best of my knowledge, signed for the delivery. The contents of the package were identical to those in the package delivered on January 23, 2019, except for the inclusion of an additional document titled "Summary of the Document to be Served." No other documents were included in the package. Attached hereto as **Pokorna Exhibit 2** is a true and correct copy of the document titled "Summary of the Document to be Served" contained in the February 4, 2019 package (all other documents from the February 4, 2019 package having been omitted from Pokorna Exhibit 2 to save space).

4. On February 19, 2019, I received a package at HMD Global Oy's London office that was delivered by a courier service—to be clear, again not by a bailiff or other government official. The package contained the same documents as the previous February 4, 2019 delivery. For example, the document titled "Summons in a Civil Action" was again addressed to "HMD Global," and the package contained a document titled "Plaintiff's Original Complaint for Patent Infringement." No other documents beyond what had previously been delivered were included in the package.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 15th day of April, 2019, in London, United Kingdom.



Martina Pokorna